

Homeland Security through Compliance Assistance

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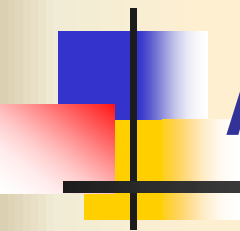
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Strategic Planning for Homeland Security— A New Role for Compliance Assistance Providers



National Compliance Assistance
Providers Forum
San Antonio, TX
December 6 2002



Discussion

- EPA's Homeland Security Plan
- Wastewater Infrastructure Concerns
- VSATTM Asset-Based Vulnerability Assessment
- Thinking Like a Terrorist
- Preparedness Activities in Your Community
- A New Role for the Compliance Assistance Community



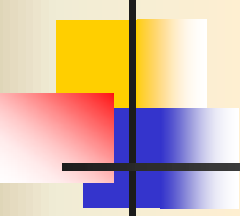
Strategic goals

- Critical infrastructure protection
- Preparedness, response and recovery
- Communication and information
- Protection of EPA personnel and infrastructure



Critical infrastructure protection

- Enhance water/wastewater security
- Enhance chemical and oil industry security
- Reduce vulnerability of indoor environments to chemical, biological and radiological incidents
- Ensure availability of critical threat monitoring information/technologies



Preparedness, response and recovery

- Capable response anywhere/anytime
- Communicate Agency roles, responsibilities and capabilities to other response agencies
- Support and develop state, tribal, local and private sector preparedness and response capabilities
- Advance scientific/technical knowledge base relevant to homeland security



Communication and information

- Ensure informed decision making through reliable information collection
- Effectively disseminate timely, quality environmental information to all levels of government, industry and the public
- Rapidly and openly exchange information with national security community



Protect EPA personnel and infrastructure

- Safeguard all Agency employees
- Ensure continuation of essential functions and operations
- Maintain secure analytical, information and telecommunication infrastructures
- Secure and maintain operational, all Agency physical structures and assets



Security aspects for wastewater infrastructure

- 16,000 publicly owned treatment works
- Size variability up to 1.4 billion gallons per day
- Service areas exceeding 850 square miles
- Thousands of miles of small sewerage systems, hundreds of miles of large intercepting sewers, remote pumping stations
- 90 percent of American industry tributary



AMSA responds—Vulnerability Self-Assessment Tool (VSAT™)

- Represents over 300 wastewater utilities
- 30 years serving POTW community in partnership with EPA
- Serve majority of US population/
18 billion gallons of wastewater daily
- VSAT™ funded by EPA for use by all public and private wastewater utilities



VSATTM Overview

- Physical plant
 - Perimeter
 - Entry / access control
 - Surveillance
 - Vehicle and materials delivery management
 - Collection System
 - **Pretreatment inspector training to identify vulnerable points in sewerage system**
 - Hazardous material control
 - **Identification of acutely hazardous materials from adjacent facilities**



VSAT™ Overview

- People

- Human resource policies (criminal background, emergency communication, military leave, ensured staffing, compensation)
- Personnel identification and personal welfare
- **Planning and employee training (including hazardous materials handling)**



VSAT™ Overview

- Knowledge base
 - Planning (disaster recovery testing, law enforcement and emergency response communication)
 - Critical business documents
 - Secure paper or electronic backup
 - Secure command center
 - Protection from public disclosure for sensitive documents
 - IT policies and system access management
 - System protection (cyber attack, power or network disruption)



VSAT™ Overview

- Communications
 - **Customer awareness of emergency planning**
 - Public information / media management
 - **HazMat coordination with local fire/rescue and law enforcement**
 - **Customer access to report suspicious activities**



Thinking like a terrorist

- Necessary components for terrorist activity
 - Target selection
 - Developmental capability
 - Materials acquisition
 - Delivery mechanism
- Likelihood of attack is a function of all four components



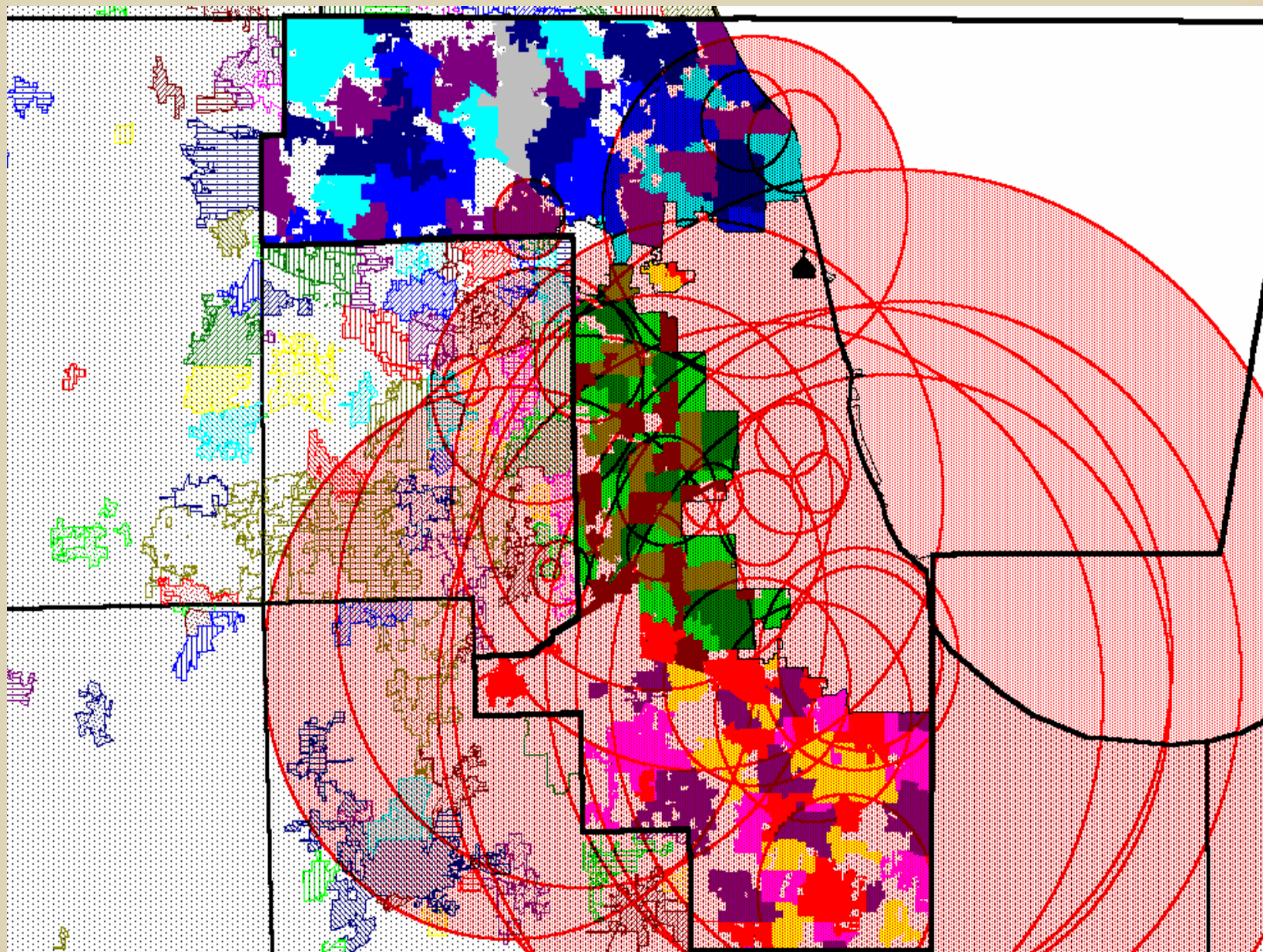
Threat evaluation matrix

Threat	Impact Area	Development Capability	Acquisition Capability	Delivery Capacity	Prevention Strategy
Informational	IT Systems	High	High	Moderate to High	Restrict network access; maintain anti-virus technology
Physical	Pump stations	High	Explosives—low; combustible/corrosives—high	Direct—low; indirect—high	?



Threat evaluation matrix

Threat	Impact Area	Development Capability	Acquisition Capability	Delivery Capacity	Prevention Strategy
Chemical/ Biological	Treat- ment process	High—Many available chemicals are toxic to activated sludge process	High	Direct— very low; indirect— moderate to high	?
Radiological	Biosolids	High— Materials for medical and industrial use fully developed	Low to moderate; NRC regulated, but not well monitored	Direct— very low; indirect— high	?





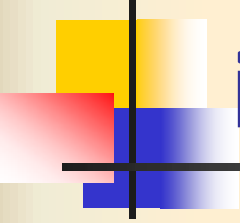
Preparedness activities in your community

- Local Emergency Planning Committees
 - Authorized under EPCRA, but not fully implemented in all areas
 - Stakeholders include fire, police, local government (POTW), industry, local medical providers, community-based organizations
 - Funded through State emergency preparedness organizations
 - Access to limited State resources and training



Preparedness activities in your community

- Metropolitan Medical Response Systems
 - Identify C/B/R agents and implement protective response actions
 - Local caches sufficient to treat 1,000 patients
 - Ability to transport patients nationwide
 - Ability to activate mutual aid support
 - Enhanced triage, treatment and decontamination capabilities at the incident site and definitive care facilities
 - Under development in 70 largest US cities
 - **POTWs not included in MMRS planning**



Preparedness activities by industry

- DOJ / Sandia Laboratories chemical facilities project
 - Assessment criteria—off-site fatalities from *airborne* chemical exposures
 - Sub-lethal exposures and non-airborne releases were *never considered* to be of consequence for emergency planning
- Other industrial sectors developing vulnerability assessment tools
- Who's connecting the dots?



A new role for the compliance assistance community

- Nationwide (EPA) coordination of sector initiatives
- Scientific and technical assistance to LEPCs, MMRS and regulated community
- Client services
 - Vulnerability assessments
 - Response and mitigation planning
- Only WE can connect the dots!



For additional information

EPA's "Strategic Plan for Homeland Security" is available at
www.epa.gov/epahome/downloads/epa_homeland_security_strategic_plan.pdf

Association of Metropolitan Sewerage Agencies
www.amsa-cleanwater.org

VSAT™ is available to qualified wastewater officials at
www.vsatusers.net

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U.S. EPA-Region 8

Art Palomares

Office of Enforcement, Compliance and
Environmental Justice

Presidential Directive 63

- There shall be vulnerability awareness and education programs within both the government and the private sector to sensitize people regarding the importance of security and to train them in security standards . . . ;
- Addressing vulnerabilities will require flexible, evolutionary approaches that span both the public and private sectors, and protect both domestic and international security;
- The United States will take necessary measures to swiftly eliminate any significant vulnerability . . .

The Office of Homeland Security has identified five function areas:

Detection, Prevention,
Preparedness, Protection,
Response/Recovery

ECEJ's program focus is on three of the five function areas:

- Detection
- Protection
- Prevention

Why did Region 8 get involved?

- Winter Olympics in Salt Lake City
- Request from the FBI to assist in Aerial Pesticide Applicator Surveys and phone interviews
- State of North Dakota has requested Region 8 for language to incorporate into the FY2003 PPA regarding Homeland Security activities



Our Lessons Learned

- FBI Concerns;
- Need for Vulnerability Assessments;
- Need for Environmental Databases;
- Need for Outreach to Known Regulated Community Contacts;
- Need for Federal, State, and Local Partnership to Implement the Five OHS Function Areas.

Why should States/Regions get involved?

- Enforcement and compliance activities add value to the implementation of Homeland Security activities
- Appropriate venue for enforcement
 - Dissemination of information
 - Detection
 - Prevention
- States involved in Homeland Security through the PPA process



Can Existing Program Activities be Enhanced to Promote:

- Information Exchange;
- Communication;
- Education and Awareness Building;
- Detection and Awareness;
- Vulnerability Assessment.

Program Opportunities

- Knowledge of Vulnerable Sectors and Facilities Including:
 - Power;
 - Refineries;
 - Fuel Storage;
 - Pesticides;
 - Water Programs;
 - Minor and/or Area Sources.
- Knowledge of:
 - Industrial Processes;
 - Material and Waste Handling;
 - Facility Operations;
 - Release Vulnerabilities.

Current Program Opportunities

- Thousands of State and Federal Inspections per year;
- Thousands of Compliance Assistance Efforts;
- Workshops;
- Outreach Efforts.

Our Regulatory Programs are Designed to:

- **Detect:** Releases or risks of releases;
- **Prevent:** Both accidental and intentional releases;

Programs and their Focus

- Prevention:

- Pesticides
- Resource, Conservation and Recovery Act
- Drinking Water

Programs and their Focus

- Prevention and Preparedness:
 - Emergency Planning and Community Right to Know Act;
 - Clean Air Act – Risk Management Planning to Prevent Releases;
 - Supplemental Environmental Projects.

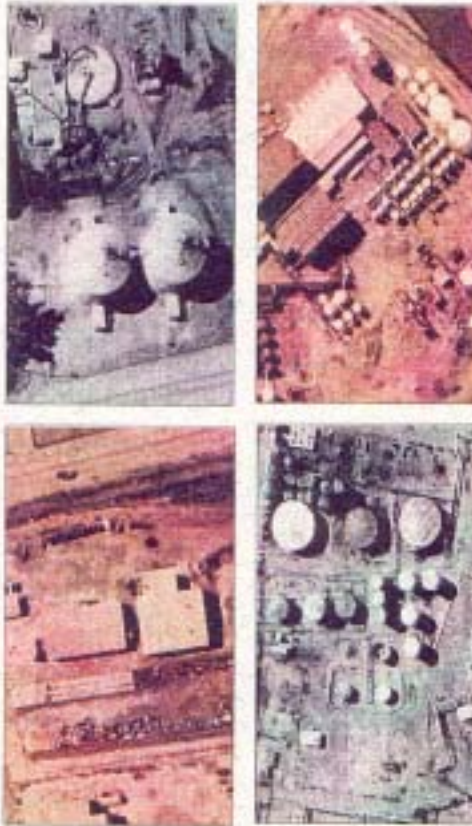
What has Region 8 done?

- We are currently:
 - Identifying and targeting those areas that pose the greatest risk;
 - Providing information: Security Awareness Brochure, Security Assessment Checklists, Security Strategies, etc.;
 - Providing education, and assessment feedback to the regulated community regarding vulnerabilities and potential terrorist risks.
 - Communicating with stakeholders and partners
 - FBI
 - State Agriculture Departments

Region 8 (SENF-T)



Security Awareness For Industrial And Municipal Facilities



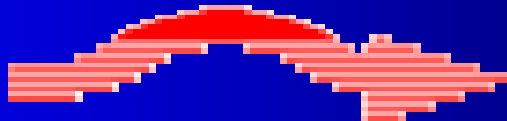
Objective of Denver Meeting

- To identify, share, and leverage current and planned Regional, NEIC, and OECA activities as they impact Homeland Security;
- To evaluate how these activities contribute to the implementation of the Agency's Homeland Security Strategic Plan;
- To reach consensus on next steps
 - Transition from strategic to tactical
 - Develop a possible action plan for implementation.



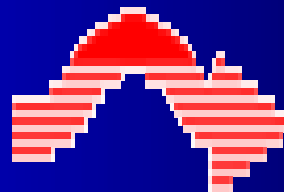
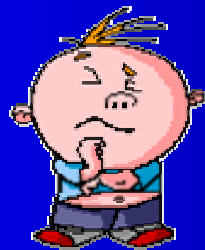
Outcomes of Denver Meeting

- Inventoried and consolidated existing activities and materials that Regions/HQ have developed;
- Found opportunities to leverage;
- Evaluated “fit” of activities into EPA HS Strategic Plan;
- Evaluated tactical activities (criteria used: cost/implementation, time frame, MOA overlap, jurisdiction issues, required coordination, federal and other government partnerships);
- Identified unresolved issues related to strategic and tactical implementation.



Conclusions from Denver Meeting

- Civil enforcement has a significant role in implementing the Homeland Security Strategic Plan;
- Many Homeland Security related activities can be implemented with little or minor effect on core activities;
- Clearer direction and increased coordination (in both OECA and Regions) to move from strategic to tactical.



Examples of Regional Activities

- Water Security Checklists
- Security Awareness Brochures
- Targeting Schemes
- Working in EJ Areas to Educate Community
- Communication and Training to States and Regional Staff
- Prioritized Program Implementation

Steven Brill, Newsweek

9/16/2002

- Report Card:
- Ports: B
- Borders: D-
- Major Public Events: A
- Dirty Nukes: C
- Public Buildings C+

Chemical Plants and Other Hazardous Materials: F

- “This is a thousand-points-of-vulnerability risk that has remained largely below radar One blown-up plant, truck, or train, and the press will be calling for the scalps of those who let it happen.”